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28903

Author: *r2av*@southwind.net at Internet
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Priority: Normal
TO: 9-NPRM-CMTS at ARM
Subject: Docket No. 28903
RE: Docket No. 28903
Type Certification Procedures for Changed products;
Proposed Rule

(32)

Comment,

The proposed requirement of requiring all certification of changes to be based on current regulatory standards discards the benefits of incremental safety changes in favor of massive gains. A very likely effect of such mandated regulation will be that NO changes to existing aircraft designs will be incorporated due to the increased cost of certification. The end result would then be no safety improvements as the existing aging fleet will continue to be flown as is with no effort expended to improve safety. In fact, a decrease in safety is likely as the current aircraft and systems are kept in service further beyond their intended design lives.

I respectfully request thorough re-examination of the proposed rules in light of the reality of economical aircraft operation.

Russell A. Royal

FAA Designated Engineering Representative
R2 Aviation
1510 Oak Forest
Derby, KS 67037

MEMBER Airplane Owners and Pilots Association
American Institute of Aeronautics and Astronautics
Experimental Aircraft Association

EMAIL: r2av@southwind.net
r2av@rocketmail.com
TEL: 316.788.5490
FAX: 316.788.6909